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April 15, 2024

**Via Electronic Filing**

The Hon. Cheryl L. Pollak, U.S.M.J.  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Kociubinski v. NYC Health and Hospital Corp.*  
Case No.: 1:22-cv-02865-ENV-CLP

Dear Honorable Judge Pollak:

This law firm represents Plaintiffs Renata Kociubinski, Penina Ben-Yosef, Yelena Mitrofanova and Jawwad Butt (collectively, the “Plaintiffs”) in the above-referenced action. This letter is submitted jointly with counsel for Defendant NYC Health and Hospital Corp. (d/b/a Coney Island Hospital) (the “Defendant”, or “H+H”).

Pursuant to Your Honor’s Individual Motion Practice Rules, and the directives in Your Honor’s February 2, 2022 Electronic Status Report Order<sup>1</sup>, this joint letter respectfully serves to provide the Cour with a status update in the above-referenced matter.

The parties are still in the process of scheduling depositions in the above-referenced matter. As noted in the parties’ February 2, 2024 status letter [Dckt. No. 39], The attorney previously assigned to represent H+H in this case, Kerrin Bowers, commenced parental leave earlier than anticipated.

The parties require additional time to schedule, and finalize depositions. The parties respectfully ask that they be permitted to file a joint status letter with the Court on May 29, 2024 to apprise the Court on the status of the case.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
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<sup>1</sup> The parties respectfully apologize to the Court for the slight delay in the filing of the instant letter.